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June 22, 2005

By Hand Delivery to Chambers

The Honorable Kent A. Jordan
United States District Court
844 North King Street
Lockbox 10
Wilmington, DE 19801

**RE: Shawn Russell v. Inland Paperboard & Packaging
Civil Action No. 04-855 KAJ
Our File No. 6946**

Dear Judge Jordan:

Pursuant to Your Honor's January 12, 2005 Scheduling Order, Paragraph 7, please allow this letter to serve as the parties Interim Status Report. Counsel have conferred on the language of this letter, and Plaintiff's counsel has authorized me to submit this report on behalf of both parties.

The Court is aware that the parties participated in mediation before Magistrate Judge Thyne on May 26, 2005. At this point, however, the matter remains unresolved. The parties are committed to further settlement discussions, and a second date of August 22 was scheduled by Magistrate Judge Thyne.

The parties await the Court's decision on plaintiff's motion to amend the complaint, which was filed on or about April 14. Defendant filed a response on April 25, and plaintiff filed a reply on May 4. To the extent the Court limits amending the complaint per defendant's objections, this will reduce the claims and narrow the focus of the parties discovery efforts. Accordingly, neither party has served discovery, nor have Rule 26 disclosures been exchanged at this time. Nor has defendant filed an answer to the amended complaint.

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Counsel are keenly aware of the necessity for moving this matter forward, and wish to do so with all due haste. However, neither side wishes to expend time and resources unnecessarily if certain of plaintiff's claims are not permitted to go forward. Counsel therefor respectfully request that Your Honor issue a decision on plaintiff's motion at the earliest opportunity.

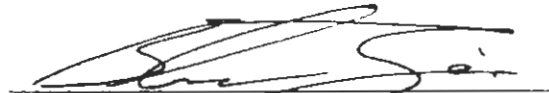
Also pending is plaintiff's motion to extend discovery deadlines. Defendant does not object to such extension, in light of the current status of discovery. Neither party, however, wishes to delay trial in this matter, and it is respectfully requested that any change to the current discovery schedule not unduly delay the current trial schedule. Trial is presently scheduled to commence on February 21, 2006, and to take four (4) days.

Counsel are available at the Court's convenience if there are any questions concerning this Report, and offer their thanks for Your Honor's consideration of the requests made herein.

Very truly yours,

TIGHE, COTTRELL & LOGAN, P.A.

By:


G. Kevin Fasic, Esquire

GKF/jt

Cc: Benjamin A. Schwartz, Esquire